## LAW OFFICES GOLDBERG, GODLES, WIENER & WRIGHT

1229 NINETEENTH STREET, N.W. WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG JOSEPH A. GODLES JONATHAN L. WIENER LAURA A. STEFANI DEVENDRA ("DAVE") KUMAR (202) 429-4900 TELECOPIER: (202) 429-4912

e-mail: <u>general@g2w2.com</u> website: www.g2w2.com

HENRIETTA WRIGHT THOMAS G. GHERARDI, P.C. COUNSEL

THOMAS S. TYCZ\* SENIOR POLICY ADVISOR \*NOT AN ATTORNEY

March 1, 2011

## **Electronic Submission**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: Infosat Able Holdings, Inc. Certification of CPNI Filing, EB Docket No. 06-36

Dear Ms. Dortch:

Infosat Able Holdings, Inc. hereby submits the attached annual CPNI certification and compliance statement.

Please do not hesitate to address any questions to the undersigned.

Respectfully submitted,

Joseph A. Godles

Counsel to Infosat Able Holdings, Inc.

FCC@BCPIWEB.COM

CC:

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: March 1, 2011

Name of company covered by this certification: Infosat Able Holdings, Inc.

Name of signatory: Daniel S. Goldberg

Title of signatory: President & CEO

I, Daniel S. Goldberg, certify that I am an officer of the company named above, and that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed /s/ Daniel S. Goldberg \_

## ANNUAL CPNI COMPLIANCE STATEMENT AS REQUIRED BY SECTION 64.2009(e) OF THE FCC'S RULES

The following statement explains how operating procedures followed by Infosat Able Holdings, Inc. ("Infosat Able Holdings") ensure that it complies with the Customer Proprietary Network Information ("CPNI") rules established by the Federal Communications Commission (*i.e.*, 47 C.F.R., Part 64, Subpart U).<sup>1</sup>

To the extent Infosat Able Holdings has access to CPNI as defined by Section 222(h)(1) of the Communications Act, it does not use CPNI within the United States for any purpose prohibited or otherwise limited by the Commission's CPNI rules.

In some cases Infosat Able Holdings markets to United States customers through distributors that act as agents of Infosat Able Holdings; these distributors are subject to a confidentiality clause prohibiting disclosure of confidential information, including CPNI, without prior written consent from Infosat Able Holdings. Infosat Able Holdings does not disclose CPNI to such distributors except in accordance with Section 64.2005(a) of the Commission's rules. Infosat Able Holdings employees are informed of the appropriate use of CPNI, and are prohibited from releasing CPNI to any party other than distributors who operate under confidentiality agreements as described above. Employees who do not follow the above procedures are subject to disciplinary action.

Because Infosat Able Holdings does not use CPNI and does not engage in any marketing activities in the United States except in accordance with Section 64.2005(a) of the Commission's rules, it does not presently (1) have in place a system by which the status of a customer's CPNI approval can be clearly established (no approval is sought because the CPNI is not used), (2) maintain a record of its sales and marketing campaigns that use its customers' CPNI (there are no such campaigns), and (3) have in place a supervisory review process with respect to outbound marketing situations (there is no outbound marketing). However, Infosat Able Holdings stands ready to comply with these provisions of the Commission's CPNI rules should it begin using CPNI for marketing or other purposes not permitted by the rules.

As stated in a notification that was filed on December 12, 2008, a sister company, Able Infosat Communications, Inc., has assigned its Section 214 international common carrier authorizations to Infosat Able Holdings.